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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEEP WOODS HOLDINGS, LLC,

Plaintiff-Appellee,

-against-

SAVINGS DEPOSIT INSURANCE FUND OF
THE REPUBLIC OF TURKEY (TASARRUF
MEVUATI SIGORTA FUND),

Defendant-Appellant,

Index No. 07 CV 934 (AKH)

**DECLARATION OF JAMES
S. O'BRIEN, JR.**

James S. O'Brien, Jr., pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney at law duly licensed to practice before the U.S. Court of Appeals for the Second Circuit, the courts of the State of New York, and the Southern and Eastern Districts of New York and am a member of the law firm Pryor Cashman LLP, counsel of record to Plaintiff Deep Woods Holdings, LLC ("Deep Woods") in this action since 2007, and as such am fully familiar with the proceedings herein. I submit this declaration in support of Pryor Cashman LLP's Motion to Withdraw as Counsel of Record for Plaintiff Deep Woods Holdings, LLC.

2. There are currently no dates on the Court's calendar associated with this action. There is no activity in the litigation with the exception of Defendant's post-judgment discovery

requests where Deep Woods and Defendant have stipulated that responses and objections are not due before March 19, 2015.

3. Throughout the foregoing litigation Pryor Cashman has represented Deep Woods pursuant to a standard retainer agreement whereby Deep Woods pays Pryor Cashman's hourly rates for attorney and paralegal time spent working for Deep Woods as well as for costs and expenses incurred in connection with Pryor Cashman's representation of Deep Woods.

4. Pryor Cashman has not been paid since 2012 and is currently owed nearly \$900,000 for its services in representing Deep Woods. Accordingly, the firm wishes to withdraw and Deep Woods managing member, Donald Glascoff, has consented to the withdrawal, and thus this motion is unopposed.

5. Pursuant to the New York Rules of Professional Conduct 1.16(e), Deep Woods has been apprised of the fact that this motion is being made, and the papers filed in connection with this motion will be emailed and sent via federal express to Mr. Glascoff as they are filed.

6. Mr. Glascoff has conveyed to Pryor Cashman that Deep Woods is in the process of retaining new counsel.

7. Pryor Cashman is asserting a retaining lien on Deep Woods files pending full payment of its fees, costs and expenses.

Dated: March 5, 2015
New York, New York

/s/ James S. O'Brien, Jr.
James S. O'Brien, Jr.